

USM

Conference call 5/21/15

Carolyn Casey

Craig Ziady

Bruce Hoskins FSL

Lines of evidence supporting the likelihood that the indoor air levels of APH in Building 100 are from subsurface vapor intrusion include:

- Levels in indoor air exceeding MassDEP Threshold values;
- Petroleum odor emanating from sub-slab soil vapor core SG-1, documented in the FSL March 2015 sampling Report;
- Elevated sub-slab soil vapor APH levels, (SG-4, C9-C18 max = 3700 ug/m3) though slightly less than the MassDEP residential screening value;
- Historic groundwater testing results by gas chromatograph, which identified mineral spirits and gasoline in GSB201-OW. This well was located near the former gasoline station in the vicinity of Building 100, and the Chip Shed operations;
- Several gasoline storage tanks were formerly located in the vicinity of Building 100; and
- The lack of documentation of any indoor source of APH contamination.

Craig Z. - Want some direction on when there will be enough data, why is it always more?

I ran through point above.

Bruce H. - interesting that we think there is sig VI occurring. They believe the opposite. Lack of VI based on conc in IDA greater the soil gas. Soil gas below DEP criteria so could stop there. I disagreed. Talk about lack of co-located soil gas and IDA, conc in air less than soil gas. Bruce said no pathways, no cracks. I asked how they would know since all floors carpeted. Mentioned FID to locate pathways. They have not found any IDA sources.

Craig asked What Jack's role is?

I said tech support. EPA is lead on site but there is an AUL so state involvement and we work together on a lot of sites. We use DEP policy so often confer with DEP. We try to have one point of contact.

Bruce said they are basically trying to use DEP policy as well, if they are doing things that do not agree, let them know.

Said I disagree that they are following policy. They would have done subslab when initially asked, would have started with GW and then would have done IDA. Did not have multiple lines of evidence. We jumped to IDA because we did not have GW and good soil gas data and it seemed like going backwards

to obtain such data. Also were not evaluating CEP. Had to ask several times to get SS soil gas. Said eco RA not complete yet and I am not sure how I can do the GW EI with essentially no GW data. I also mentioned lack of conclusions or recommendations other than S&A in summer to get soil gas then too. Then will do a RA.

Bruce said this is just a data summary report, not intended to be more.

I said I did not have a problem with what is proposed but need to review report more.

Craig upset with always a new request for more sampling. I said it's partly the nature of environmental work, to do sampling incrementally. I mentioned being proactive with remediation vs sampling over and over. That is certainly EPA's direction particularly where there are sensitive receptors.

Said I will generate technical comments run by Jack and send comments to Cummings by mid to late June.

Note – no further comments sent. MassDEP completed a review of the chromatograms. Refer to memo from Jack Miano, MassDEP, dated August 2015.